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Hyundai Capital America,
Improperly identified as Hyundai
Capital America, Inc. dba Kia Motors Finance*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cheryl Telmo,

Plaintiff,

vs.

Trans Union, LLC; Experian Information
Solutions, Inc.; and Hyundai Capital America,
Inc. dba Kia Motors Finance, Inc.

Defendants.

Case No. 2:22-cv-01772-GMN-DJA

**JOINT UNOPPOSED MOTION TO
EXTEND DEFENDANT HYUNDAI
CAPITAL AMERICA'S DEADLINE TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Defendant Hyundai Capital America, improperly identified as Hyundai Capital America, Inc. dba Kia Motors Finance, Inc. ("HCA") and Plaintiff Cheryl Telmo ("Plaintiff," collectively the "Parties"), by and through their respective attorneys, hereby agree and stipulate to extend the time for HCA to answer or otherwise respond to Plaintiff's Complaint, through and until March 9, 2023. The current deadline for HCA to respond is February 16, 2023. This is HCA's first request to extend this deadline.

HCA and Plaintiff are investigating and discussing the allegations and underlying facts of this matter, and the requested extension will allow the parties the opportunity to attempt resolution

1 without the need for further litigation. This request is made in good faith and not for the purpose of
2 delaying these proceedings.

3
4 Dated: February 14, 2023

Respectfully submitted,

5 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

6 /s/ Brittni Tanenbaum
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20 *Capital America, Inc. dba Kia Motors Finance*

21
22 Dated: February 14, 2023

Respectfully submitted,

23 **FREEDOM LAW FIRM, LLC**

24 /s/ Gerardo Avalos (w/permission)
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Attorneys for Plaintiff Cheryl Telmo

29 **ORDER**

30 **IT IS SO ORDERED.**

31 
UNITED STATES MAGISTRATE JUDGE

32 DATED: February 15, 2023

CERTIFICATE OF SERVICE

I hereby certify that, on February 14, 2023, a true and exact copy of the foregoing has been served upon all parties via CM/ECF.

/s/ Sharon L. Kuller

An employee of Lewis Roca
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